

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*  
ALEX DOE, Relator, THE STATE OF  
TEXAS, *ex rel.* ALEX DOE, Relator, THE  
STATE OF LOUISIANA, *ex rel.* ALEX DOE,  
Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC., PLANNED  
PARENTHOOD GULF COAST, INC.,  
PLANNED PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED PARENTHOOD  
SOUTH TEXAS, INC., PLANNED  
PARENTHOOD CAMERON COUNTY,  
INC., PLANNED PARENTHOOD SAN  
ANTONIO, INC.,

Defendants.

No. 2:21-cv-022-Z

**UNOPPOSED MOTION TO WITHDRAW COUNSEL**

Defendant Planned Parenthood Federation of America, Inc. (“PPFA”) files this Unopposed Motion to Withdraw Counsel, Justin Chapa, in the above-styled and numbered case, and respectfully shows as follows:

1. PPFA is represented by O’Melveny & Myers LLP in the above-captioned case. Its lead counsel is Leah Godesky.
2. Justin Chapa was previously counsel for PPFA in the above-captioned case.
3. Mr. Chapa is no longer employed by O’Melveny & Myers LLP.
4. Undersigned counsel will remain counsel of record for PPFA.
5. Plaintiffs are unopposed to this Motion.

6. Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood of South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc. (“Affiliate Defendants”) are unopposed to this Motion.

For the foregoing reasons, PPFA respectfully requests that the Court note the withdrawal of Justin Chapa as counsel of record in the above-styled and numbered case.

Dated: July 6, 2023

Respectfully submitted,

O’MELVENY & MYERS LLP

By: /s/ Danny S. Ashby

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*Attorneys for Defendant Planned Parenthood  
Federation of America, Inc.*

**CERTIFICATE OF CONFERENCE**

On July 6, 2023, I conferred with counsel for the State of Texas, Will Wassdorf, who indicated that the State of Texas is unopposed to this motion. I also conferred with counsel for Relator, Andrew Stephens, who indicated that Relator is unopposed to this motion. I also conferred with counsel for Affiliate Defendants, Tirzah Lollar, who indicated Affiliate Defendants are unopposed to this motion.

/s/ Danny S. Ashby  
Danny S. Ashby

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2023, a copy of the foregoing was served pursuant to the Court's ECF system.

/s/ Danny S. Ashby  
Danny S. Ashby